



Storm Water Permitting Documents

Do You Need Them
and
Tools for Successful Implementation

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Topics of Discussion

- Definitions
- Regulatory Requirements
- Universal Program Elements
- Best Management Practices
- Program Implementation

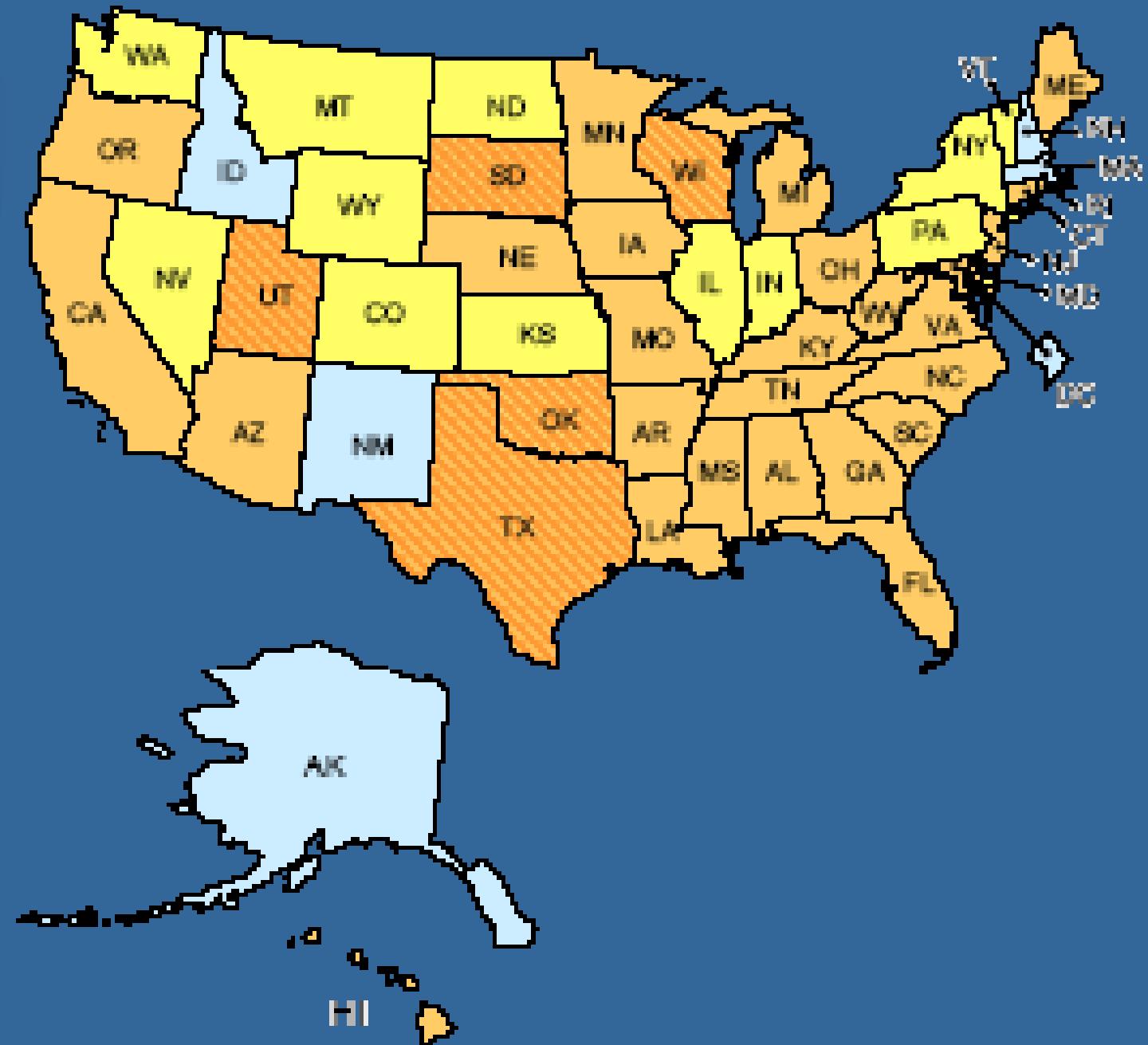
Definitions



- Storm Water
 - Surface runoff resulting from precipitation
- Pollutant
 - Natural or man made addition to waters
- Pollutant Discharge
 - Any addition of pollutants into navigable waters from any point source

Regulatory Requirements

- 40 CFR Part 122
 - Prohibits point source discharges of storm water associated with industrial activity to a waters of the U.S. without a permit
 - Based primarily in SIC code
- Federal program often controlled by each state



Regulatory Requirements

- Do you need a permit?
 - Depends on location and operations
- Individual vs. General Permit
 - Based on operations
 - Based on SIC code
 - Requirements vary from sector to sector and state to state

Regulatory Requirements

- Permit documentation
 - Permit Application (NOI or other)
 - Storm Water Management Plan (SWPPP, etc.)
 - Facility inspection reports
 - Storm water inspection reports
 - Storm water sampling data
 - Discharge monitoring reports (if applicable)
 - Training documentation
 - BMP procedures

Universal Program Elements

- Good housekeeping
- Preventive maintenance
- Visual inspections
- Material handling and spill prevention
- Erosion control
- Runoff management
- Training



Universal Program Elements

- Housekeeping
 - All areas that may contribute pollutants to storm water discharges shall be maintained in a clean, orderly manner.
 - Vehicle/Equipment storage and cleaning areas
 - Fueling areas
 - Material storage areas

Universal Program Elements

- Preventive Maintenance
 - Timely inspections and maintenance of all storm water management devices
 - Inspection and maintenance of facility equipment

Universal Program Elements

- Visual Inspections
 - Visually inspect facility
 - All appropriate areas for signs of pollutants impacting storm water discharge.
 - Frequency permit dependent
 - Visually inspect storm water discharge
 - At each outfall
 - Usually once per quarter

Universal Program Elements

- Material Handling
 - Procedures to prevent or minimize the potential for discharge of materials to storm water during storage or transfer operations.
 - Solids or liquids
- Spill Prevention
 - Facility Spill Prevention Plan
 - SPCC, SPCR, etc.

Best Management Practices (BMPs)

- Where YOU can make a difference
 - Housekeeping
 - Preventive Maintenance
 - Equipment Washing
 - Fueling/Bulk Transfer
 - Material Handling
 - AST management

BMPs

- Housekeeping
 - Police outside areas daily
 - Sweep outside areas on a scheduled basis
 - Dry sweep all spills or releases immediately upon discovery
 - Immediately report any signs of spills or releases
 - Document or log all housekeeping activities

BMPs

- Preventive Maintenance
 - Inventory equipment which if malfunctions could impact storm water
 - Establish inspection and maintenance schedules for all appropriate equipment
 - Repair or replace defective equipment within 48 hours
 - Drain oil filters before disposal or recycle
 - Document all maintenance activities

BMPs

- Equipment/Vehicle Washing
 - Clean equipment inside when possible
 - Use an offsite car wash if available
 - Use mild, phosphate-free detergents
 - If outside
 - Designate specific cleaning areas
 - Provide containment systems
 - Provide tarps or absorbent materials to minimize discharge

BMPs

- Fueling/Bulk Transfer
 - Provide spill/overflow protection (drip pans)
 - Develop procedures to minimize overfill
 - Double check hose connections
 - No top off
 - Transfer must be observed at all times
 - Use dry cleanup methods
 - Seal off storm drains during transfer
 - Ensure all hoses are properly disconnected

BMPs

- Material Handling
 - Develop standard loading/unloading procedures
 - Use designated loading/unloading areas
 - Use drip pans or other spill containment
 - Clean all spills immediately upon completion
 - Transfer materials inside or under cover when possible

BMPs

- AST Storage
 - Comply with Spill Prevention/Response Plan
 - Upgrade ASTs with overflow alarms
 - Routinely inspect all ASTs and containment structures
 - Install secondary containment

Program Implementation

- Description of Potential Pollutant Sources
- BMP Management and Control
- Storm Water Monitoring
- Facility Inspection
- Recordkeeping and Reporting